

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**STEVE M. BAJIC,
RAJESH TANEJA,
NORFOLK HEIGHTS LTD.,
FOUNTAIN DRIVE LTD.,
ISLAND FORTUNE GLOBAL LTD.,
CRYSTALMOUNT LTD.,
WISDOM CHAIN LTD.,
SSID LTD.,
SURE MIGHTY LTD.,
TAMARIND INVESTMENTS INC.,
KENNETH CIAPALA,
ANTHONY KILLARNEY,
BLACKLIGHT SA,
CHRISTOPHER LEE MCKNIGHT,
and
AARON DALE WISE,**

Civil Action No. 20-cv-00007-LGS

Defendants.

**DECLARATION OF KATHLEEN SHIELDS REGARDING SERVICE OF THE
COURT'S NOVEMBER 18 ORDER (DOCKET NO. 211)
ON DEFENDANTS SSID LTD. AND BLACKLIGHT SA**

I, Kathleen B. Shields, pursuant to 28 U.S.C. §1746, hereby declare that:

1. I am a senior trial counsel for the Securities & Exchange Commission and have been admitted in this case pro hac vice. I have been the lead trial lawyer in this action since it was filed on January 2, 2020 and I am familiar with all the facts and circumstances in this action.

2. On November 24, 2020, I served the following documents on defendant SSID Ltd.: 1) the Court's Scheduling Order For Damages Inquest (Dkt. No. 211); 2) the

Default Judgment (Dkt. No. 207); 3) Declaration of Kathleen Shields in support of the requested disgorgement and prejudgment interest amounts (Dkt. No. 187); and 4) Exhibits 1-10 to that declaration (Dkt. No. 187-1 to 187-10). I served these documents by emailing them to Rajesh Taneja, in his capacity as Owner/Director/Officer of SSID. This method of delivery is intended to ensure delivery to defendant SSID Ltd. because Mr. Taneja has previously interacted with the Commission through counsel on behalf of SSID Ltd. Further, delivering documents to defendant SSID Ltd. by overnight mail to its business address in Hong Kong is not likely to ensure delivery because the last overnight mail delivery that the Commission sent to defendant SSID at that address was returned as undeliverable.

3. On November 24, 2020, I served the following documents on defendant Blacklight SA: 1) the Court's Scheduling Order For Damages Inquest (Dkt. No. 211); 2) the Default Judgment (Dkt. No. 207); 3) Declaration of Kathleen Shields in support of the requested disgorgement and prejudgment interest amounts (Dkt. No. 187); and 4) Exhibits 1-10 to that declaration (Dkt. No. 187-1 to 187-10). I served these documents by emailing them to United States counsel for Kenneth Ciapala and Anthony Killarney, the two co-owners and principals of Blacklight. On November 24, 2020, I also emailed the Swiss attorney for Blacklight SA to notify him that these documents have been filed with the Court, are available on the Court's website through PACER, are also available to him through counsel for the principals of Blacklight and that I will send them to him if he responds to ask that I do so. My understanding is that Swiss penal laws prohibit me from sending these documents directly to Blacklight's attorney without a request from him that I send them. In that email, I also notified Blacklight SA's Swiss attorney of the schedule established in the Court's scheduling order.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 24, 2020

/s/ Kathleen B. Shields
Kathleen B. Shields